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Attorneys for Defendant
KEYPOINT GOVERNMENT SOLUTIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONALD LOUNIBOS, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

KEYPOINT GOVERNMENT
SOLUTIONS, INC., a Delaware
Corporation, and Does 1-10, inclusive,

Defendants.

Case No. 12-CV-0636 (EMC)

**STIPULATION AND [PROPOSED] ORDER
CONTINUING DEADLINE FOR
FILING MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

STIPULATION

Plaintiff Donald Lounibos (“Plaintiff”) and Defendant Keypoint Government Solutions, Inc. (“Defendant”) (collectively “the Parties”), stipulate and agree as follows:

WHEREAS, on November 2, 2012, the Parties engaged in a full day mediation session with the Hon. David Garcia (Ret.) (“Judge Garcia”) at JAMS in San Francisco, California, at which time the Parties were not able to settle the case but agreed to continue settlement discussions. Thereafter, the Parties continued settlement discussions through Judge Garcia and on November 14, 2012, the Parties reached a settlement in principle based on the terms discussed at the mediation and based on further discussions and proposals made by the Parties and by Judge Garcia and have resolved this matter on a class-wide basis;

WHEREAS, on January 7, 2013, the Parties filed a Joint Stipulation and Proposed Order Continuing Deadline for Filing Motion For Preliminary Approval of Class Action Settlement. This Stipulation and Proposed Order was entered by the Court on January 9, 2013. In particular, the Court’s Order reset the Case Management Conference and the hearing on the Motion for Preliminary Approval for February 28, 2013, and set Plaintiff’s deadline to file its Motion for Preliminary Approval for on or before January 24, 2013;

WHEREAS, the Parties have been working on the terms of the settlement agreement, notice and claim forms but have not finalized all of these documents. As such, the parties require additional time to finalize the terms of the settlement agreement, as well as to finalize the claim and notice forms and to file the Motion for Preliminary Approval of Class Action Settlement.

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1 **IT IS HEREBY STIPULATED** by the Parties herein, through their counsel of record, as
 2 follows:

3 The deadline for Plaintiff to file the Motion for Preliminary Approval shall be continued from
 4 January 24, 2013, to February 21, 2013. The Case Management Conference and the hearing on the
 5 Motion for Preliminary Approval shall be continued from February 28, 2013, to March 28, 2013, or as
 6 soon thereafter as is convenient for the Court.

7
 8 **IT IS SO STIPULATED.**

9 DATED: January 18, 2013

NORTH BAY LAW GROUP

10 _____
 11 /s/
 12 David S. Harris
 13 Attorney For Plaintiff
 14 DONALD LOUNIBOS

15 DATED: January 18, 2013

LITTLER MENDELSON

16 _____
 17 /s/
 18 Karin Cogbill
 19 Attorneys for Defendant
 20 KEYPOINT GOVERNMENT SOLUTIONS

21 **[PROPOSED] ORDER**

22 The parties having so stipulated, and GOOD CAUSE APPEARING THEREFORE, IT
 23 IS HEREBY ORDERED that:

24 Plaintiff's deadline to file the Motion for Preliminary Approval shall be continued from January
 25 24, 2013 to February 21, 2013.

26 The Case Management Conference and the hearing on the Motion for Preliminary Approval shall
 27 be continued from February 28, 2013, to March 28, 2013 at 1:30 p.m. in Courtroom 5.

28 DATED: January ²⁴ __, 2013

